

04-233

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Federal Communications Commission
Office of the Secretary

**eliminating racism
empowering women
ywca**

February 28, 2008

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell

Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

Re: *In the Matter of Broadcast Localism* (MB Docket No. 04-233)
Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

I noted with great interest that the FCC recently issued a Notice of Proposed Rulemaking on broadcast localism. From what I understand, this proceeding is intended to "ensure that broadcasters are appropriately addressing the needs of their local communities." I wanted to be one of the first to tell you that, in my view and in the view of my organization, WTVG already serves our community in any number of ways that makes any additional federal regulation unnecessary.

WTVG has partnered with the YWCA of Greater Toledo to raise awareness of issues relating to domestic violence, sexual assault and the plight of homelessness in our community. Public services announcements and special feature stories have highlighted the services offered by our agency. WTVG has also served as our media sponsor during our largest fundraiser. WTVG, for two years, has spent countless thousands on airtime, video editing and production, key talent by the best news anchor in our community and continuous promotional invitations. Our fundraising efforts for this event would not survive without the generous support of WTVG.

It is because of my first-hand experience with such a long-standing partnership that I am curious as to why the FCC deems it necessary to issue additional regulations. In my view, our community already is well-served by WTVG and no national regulation could create the kind of great local partnership that we already enjoy.

Sincerely,

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Lisa McDuffie
Chief Executive Officer

Cc: Michelle Carey
Rick Chessen
Rudy Brioche
Amy Blankenship
Cristina Pauze
Monica Desai

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**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

FCC Mail Room

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so -- and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so -- even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency -- and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

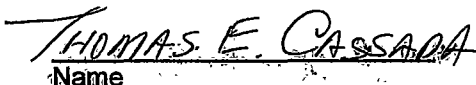
(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks -- and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.



Signature



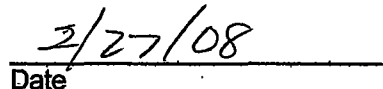
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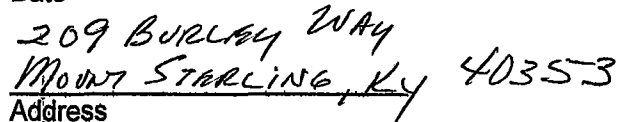
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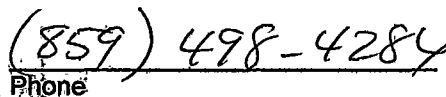
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Susan A. Campbell

Signature

John R. Campbell
Susan A. Campbell

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Title (if any)

Organization (if any)

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